

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

BATES ENERGY OIL & GAS LLC,

v.

COMPLETE OIL FIELD SERVICES LLC  
AND SAM TAYLOR

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CIVIL ACTION NO. 17-CV-00808-XR

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RESPONSE TO SHOW CAUSE ORDER

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Rob L. Wiley, Counsel for Defendants David Bravo, Lorena Silvestri Bravo, and Unlimited Frac Sand, LLC, d/b/a Frac Sand Unlimited ("FSU") responds to the Court's October 21, 2019, show cause order as follows:

Counsel prepared the attached Response for filing October 3, 2019. For whatever reason, the document apparently was not filed. This failure was totally inadvertent.

The October 3 Response addresses the matters raised in the Court's initial September 11, 2019, Order by discussing:

1. The status of my representation of David Bravo, Lorena Silvestri Bravo, and United Frac Sand.
2. The failure to file a response to the Fourth Amended Counterclaim.
3. The effect of a failure to respond.

The substance of counsel's response remains unchanged.

Out of an abundance of caution, this Response is being filed electronically and served on the Court by overnight mail for delivery on November 8, 2019.

Respectfully submitted,

/s/ Rob L. Wiley

Rob L. Wiley

Texas Bar No. 21471650

Southern District Id. No. 9210

STEWART & WILEY PLLC

2202 Timberloch, Suite 110

The Woodlands, TX 77380

Phone: (281) 367-8007

Facsimile: (281) 363-4987

E-mail: [Rwiley@StewartWiley.com](mailto:Rwiley@StewartWiley.com)

**ATTORNEY FOR COUNTER DEFENDANT  
UNLIMITED FRAC SAND LLC,  
D/B/A/ FRAC SAND UNLIMITED**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2019, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system, sent the document by overnight delivery to the Clerk, and served all counsel of record in accord in the Federal Rules of Civil Procedure.

/s/ Rob L. Wiley

Rob L. Wiley

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ADVISORY BY COUNSEL FOR UNLIMITED FRAC SAND LLC D/B/A/  
FRAC SAND UNLIMITED, DAVID BRAVO, LORENA SILVISTRI BRAVO,  
INDIVIDUALLY AND D/B/A BRAVO CONSULTING SERVICES'S

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Pursuant to the Court's September 11, 2019, Order, the undersigned counsel enters the following advisory:

1. I continue representing David Bravo, Lorena Silvestri Bravo, and United Frac Sand c/b/a Frac Sand Unlimited ("Clients"). Until the last few days, the Clients have been unresponsive to inquiries concerning the case and the issues involved in the litigation. I have not, however, withdrawn or been asked to withdraw.
2. The failure to file a responsive pleading to the Fourth Amended Counterclaim was not the result of an intentional decision on the part of the Clients.
3. I have explained the effect of failing to respond to the Fourth Amended Counterclaim and discussed with them their rights with respect to the motion for entry of default and asked that they cooperate with me in responding to the motion.

Respectfully submitted,

/s/ Rob L. Wiley

Rob L. Wiley

Texas Bar No. 21471650

Southern District Id. No. 9210

STEWART & WILEY PLLC

2202 Timberloch, Suite 110

The Woodlands, TX 77380

Phone: (281) 367-8007

Facsimile: (281) 363-4987

E-mail: [Rwiley@StewartWiley.com](mailto:Rwiley@StewartWiley.com)

**ATTORNEY FOR COUNTER DEFENDANT  
UNLIMITED FRAC SAND LLC,  
D/B/A/ FRAC SAND UNLIMITED**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2019, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system and served all counsel of record in accord in the Federal Rules of Civil Process.

/s/ Rob L. Wiley

Rob L. Wiley